



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 23, 2019

BY EMAIL AND ECF

The Honorable Ronnie Abrams
United States District Judge
40 Foley Square
New York, New York 10007

Re: *United States v. Michele Morton*, 16 Cr. 371 (RA)

Dear Judge Abrams:

The Government writes to respectfully request an adjournment of its opposition to the above referenced defendant's motion to withdraw her guilty plea, which is presently due on June 21, 2019. As the Court is aware, on May 31, 2019, the defendant executed a waiver of attorney client privilege in light of the arguments raised in her motion. The Government has requested from prior counsel documents relating to their representation of Ms. Morton, including interview memoranda and email and text message communications between Morton and counsel and between the various counsel on the defense team. Prior counsel has informed the Government that in light of the volume of materials and the necessary internal reviews, such a production will require approximately 30 days. Accordingly, the Government respectfully requests that its brief be due 3 weeks from its receipt of the requested materials, which is August 5, 2019. The Government has conferred with Morton's current counsel who consents to this request.

Respectfully submitted,

AUDREY STRAUSS
Attorney for the United States, Acting Under
Authority Conferred by 28 U.S.C. § 515

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cc: Counsel of record